

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LORENZO ROBERT SAVAGE III,

Plaintiff,

- against -

**DECLARATION**

Case No. 1:24-cv-03280-NRB

ASSOCIATED NEWSPAPERS LTD. and  
MAIL MEDIA, INC.,

Defendants.

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**MARK E. GOIDELL**, Esq., declares under penalty of perjury that the statements set forth herein are true and correct:

1. I am the attorney for the Plaintiff Lorenzo Robert Savage III in the above-captioned matter, and as such, I am fully familiar with the material facts and circumstances stated herein. This Declaration is submitted in opposition to the defendants' motion to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6).
2. Annexed hereto as Exhibit A is a news report published on February 13, 2023, which can be accessed at <https://www.foxnews.com/media/top-republican-calls-investigation-secret-services-bizarre-actions-help-hunter-biden>.
3. Annexed hereto as Exhibit B are pages 250-251 of a publication known as the "Marco Polo Report," which can be accessed in full at <https://archive.org/details/report-on-the-biden-laptop-marco-polo-9624/page/292/mode/2up?view=theater>.

Dated: Garden City, New York  
January 2, 2025

/s Mark E. Goidell  
Mark E. Goidell, Esq.